



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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DENVER, CO 80202-2466

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Mr. Mike Powers  
2293 Kootenai River Rd.  
Libby, MT 59923

Dear Mr. and Mrs. Powers,

I am writing to address your concern about the safety of your home as you proceed with remodeling. Your dilemma is one I believe many people in Libby, and around the country, are facing and will continue to face for decades. It is, unfortunately, a difficult situation and I don't have perfect answers.

As EPA contemplated the decision to remove vermiculite insulation from homes in Libby, including walls, I think many people in Libby felt that the job would be easy. "Simply get where you need to be, and vacuum it out." We were widely criticized for not moving more quickly and for not attempting to investigate and clean all walls. EPA, however, understood that insulation cleanup would not be so simple, especially with regard to walls. Bulk vacuuming can remove most, but not all, of the insulation - especially in complex spaces. Before we started work last year, we thought long and hard about our approach to cleanup and how we could most effectively make the situation in Libby safe. Our decision to *not* remove insulation from all walls was based partly on the concern that, short of demolishing entire structures or portions of structures, it would be impossible to remove all of the insulation from the walls and structures of older homes. We feared that by breaching walls that are in good condition and that do not need to be remodeled, we may create false expectations about the degree of cleanliness, do more harm than good, and spend a great deal of money in the process. However, for situations where remodeling work was imminent, such as yours, we felt that we should make an exception and ensure the walls and areas targeted for remodeling were as clean and safe as possible. Truthfully, our results have been mixed and the work, as expected was very costly. As you have seen, even areas that we cleaned are not perfectly free of vermiculite, and remodeling plans can and do change. I would like to discuss our rationale and our experiences with you in more detail in early December, when I'm in Libby.



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Over time, insulation finds its way into countless nooks and crannies, many not visible without considerable demolition. For areas that we decide to clean, such as attics or walls that are scheduled to be remodeled, we try to access as many spaces as we reasonably can and clean them. If we can't completely clean them, we attempt to seal them off or spray them with latex encapsulant to lock the insulation in place. However, if we do not or cannot access some of these areas, or if the sealant is disturbed, some insulation may remain there to be released in the future. The magnitude of the release, and the resulting exposure, depends on the amount of material that is present (usually very small after our cleanup), how it was disturbed, and how it was dealt with afterwards. In most cases, we believe that the release and exposure will be small and of very short duration. While we cannot say exactly how this relates to health effects, we can say it is very, very small relative to working in bulk insulation or being exposed over long periods of time (the things our cleanup seeks to address most directly). Our approach to small post-cleanup releases, and other situations where vermiculite may be encountered in the future, is to provide homeowners with guidance for working in and around vermiculite (Living With Vermiculite Fact Sheet, EPA 2003) and to provide HEPA vacuums that can effectively remove any asbestos released into the living space. It is not a perfect solution, but dealing with vermiculite will be a fact of life for residents of Libby and for others across the country forever and there is nothing EPA can do to change that.

As we move forward with cleanup, we will continue to collect more information, gain experience, and reevaluate our approach. Part of this effort is to revisit homes that we have cleaned up and resample them. While we conduct "clearance sampling" immediately after each cleanup - homes must meet rigorous standards - this sampling does not account for every uncertainty that exists. For instance, if we leave carpets in place, are asbestos fibers released later? Is asbestos being reintroduced into homes we clean from other places we don't know about? Is asbestos released from duct work during winter or summer? Do personal possessions we don't clean re-contaminate homes? How do minor wall breaches and minor or major remodeling work affect the safety of the home? While we have assumptions regarding all of these uncertainties and have proceeded accordingly, we feel the best way we can evaluate the long-term effectiveness and safety of our cleanup approach is to sample homes well after cleanup is complete, after residents have lived their normal routine. We will be conducting the first round of this sampling this winter and would like to sample your home for obvious reasons. This will help us understand the magnitude of the release and exposure.

In the meantime, I urge you to use the HEPA vacuums we have provided you. They were intended for just such small releases of vermiculite and asbestos - those that the EPA cleanup cannot address. HEPA vacuums will remove asbestos that was released or reintroduced into the living space, ensuring that any exposure is diminished and does not persist. Please follow the suggestions provided in the Living With Vermiculite Fact Sheet. These steps together will greatly reduce the chance of exposure and minimize your health risk. If you are uncomfortable with these steps, or your remodeling requires you to work in areas where bulk insulation was not addressed by EPA, you can also hire a certified asbestos abatement contractor to conduct the remodeling work in your home.

I wish EPA could find and remove every particle of asbestos, but the fact is, we cannot. Nor can EPA return to every home we clean each time vermiculite is released or remodeling occurs. Members of the EPA site team and the Libby Technical Advisory Group (TAG) have visited with you today to reevaluate your situation, see if there are things we can do to improve it and ask your permission for follow up sampling. I respect your concerns and fears and will do the best I can to mitigate them. I also appreciate your continued faith in EPA as we try to get our hands around a difficult problem with no perfect solution.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Christiansen', with a stylized, cursive flourish at the end.

Jim Christiansen  
Remedial Project Manager

cc: Courtney Zamora  
Scott Supernaugh